

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE:	:	
Kairi E. Gould	:	
	:	
Debtor	:	Chapter 13
	:	
Kairi E. Gould	:	Bankruptcy No. 18-18076 AMC
	:	
Movant	:	
	:	
v.	:	
	:	
Aurora Financial Group, Inc.	:	
	:	
Respondent	:	
	:	
	:	
	:	
	:	

**RESPONSE OF AURORA FINANCIAL GROUP, INC. TO RESPONSE TO MOTION TO
RECONSIDER ORDER MODIFYING AUTOMATIC STAY**

Respondent, Aurora Financial Group, Inc., by and through its attorneys, Phelan Hallinan Diamond & Jones, LLP, hereby responds to RESPONSE TO MOTION TO RECONSIDER ORDER MODIFYING AUTOMATIC STAY and in support thereof, avers as follows:

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted.
6. Denied. Respondent is without information or knowledge sufficient to form a belief as to the truth of the within averment.
7. Denied. Respondent is without information or knowledge sufficient to form a belief as to the truth of the within averment. Loan is currently due for 12/01/19 – 06/01/20 payments at \$1,581.76 per month less suspense of \$1,245.34 for a total amount due of \$9,826.98.

WHEREFORE, Respondent, Aurora Financial Group, Inc. respectfully requests that this Honorable Court deny RESPONSE TO MOTION TO RECONSIDER ORDER MODIFYING AUTOMATIC STAY in its entirety.

Respectfully submitted,

Date: June 23, 2020

/s/ Jerome Blank, Esquire
Jerome Blank, Esq., Id. No.49736
Phelan Hallinan Diamond & Jones, LLP
1617 JFK Boulevard, Suite 1400
One Penn Center Plaza
Philadelphia, PA 19103
Phone Number: 215-563-7000 Ext 31625
Fax Number: 215-568-7616
Email: jerome.blank@phelanhallinan.com